

**FY 2015 QTR 3**  
**Quarterly Reports for Regulatory Compliance Regarding Underwriters'**  
**Participation in Credit Default Swaps (CDS)**

<b>NBR</b>	<b>Firm name</b>	<b>Due April 2015 (QTR 3: Jan-Mar)</b>
1	Academy Securities	X
2	Alamo Capital	X
3	Barclays	X
4	Blaylock Robert Van	X
5	Bmo Capital Markets	X
6	BoA, Merrill Lynch	X
7	Cabrera	X
8	CastleOak Securities	X
9	Citigroup	X
10	City Securities Corporation	X
11	Drexel Hamilton	X
12	Estrada Hinojosa	X
13	Fifth Third Securities	X
14	George K. Baum And Co	X
15	Goldman Sachs	X
16	Hilliard Lyons/Melvin & Co	X
17	IFS Securities	X
18	Janney Montgomery Scott	X
19	Jefferies	X
20	JP Morgan	X
21	Key Banc Capital Markets	X
22	Loop Capital	X
23	Mesirow Financial	X
24	Morgan Stanley	X
25	North South Capital	X
26	Oppenheimer and Co Inc	X
27	Piper Jaffray & Co	X
28	PNC Bank	X
29	Podesta & Co	X
30	Ramirez & Co, Inc.	X
31	Raymond James	X
32	RBC Capital Markets	X
33	Rice	X
34	Robert W. Baird	X
35	Siebert Bradford Shank	X
36	Stern Brothers	X
37	Sterne Agee	X
38	Stifel, Nicolaus	X
39	US Bancorp	X
40	Wells Fargo	X
41	William Blair And Co.	X
42	Williams Capital Group	X



April 7, 2015

John Sinsheimer, Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
100 W. Randolph Street, Suite 15-100  
Chicago, IL 60601

RE: State of Illinois Credit Default Swap Questions

Dear Mr. Sinsheimer:

Thank you for giving Academy Securities, Inc. ("Academy") the opportunity to serve the State of Illinois in the recent April GO sale. We look forward to the opportunity to serve to the State again in the near future.

In regards to the State of Illinois Default Swap Questions, please find our response below.

*Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:*

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.*

Academy **has not** participated in State of Illinois CDS activities between January 1, 2015 and March 31, 2015.

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.*

Academy **has not** entered into any proprietary trades for its own account in State of Illinois CDS between January 1, 2015 and March 31, 2015.

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.*

Academy **does not** have any outstanding gross or net notional amount of proprietary State of Illinois CDS between January 1, 2015 and March 31, 2015.

- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.*

Member FINRA, SIPC

277 Park Avenue, 35<sup>th</sup> Floor New York, New York 10172 | Main: 646 205 0240  
550 W. Van Buren, Suite 1410 Chicago, Illinois 60607 | Main: 312-635-0867

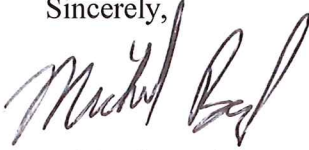
Academy **has not** held net long or net short State of Illinois CDS proprietary credit protection positions between January 1, 2015 and March 31, 2015.

- *Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.*

Academy **has not** released any publicly available research or marketing reports that reference State of Illinois CDS between January 1, 2015 and March 31, 2015.

If you have any additional questions, please feel free to contact me at (646) 736-3995, [mboyd@academysecurities.com](mailto:mboyd@academysecurities.com) or Frank Paul at (312) 635-0868, [fpaul@academysecurities.com](mailto:fpaul@academysecurities.com).

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Boyd", written in a cursive style.

Michael Boyd  
Head of Public Finance

Member FINRA, SIPC

277 Park Avenue, 35<sup>th</sup> Floor New York, New York 10172 | Main: 646 205 0240  
550 W. Van Buren, Suite 1410 Chicago, Illinois 60607 | Main: 312-635-0867



FINANCIAL SERVICES

April 30, 2015

John Sinsheimer, Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
100 W. Randolph Street, Suite 15-100  
Chicago, IL 60601

Dear Mr. Sinsheimer:

In regards to the State of Illinois Default Swap Questions, please find our response below.

*Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:*

- *In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.*

Alamo Capital **has not** participated in State of Illinois CDS activities between January 1, 2015 and March 31, 2015.

- *Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.*

Alamo Capital **has not** entered into any proprietary trades for its own account in State of Illinois CDS between January 1, 2015 and March 31, 2015.

- *Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.*

Alamo Capital **does not** have any outstanding gross or net notional amount of proprietary State of Illinois CDS between January 1, 2015 and March 31, 2015.

201 N. Civic Drive, Suite 360, Walnut Creek, CA 94596  
Phone (877) 68-ALAMO Fax (925) 472-3909  
Broker Dealer Member FINRA/SIPC  
[www.alamocapital.com](http://www.alamocapital.com)



- *List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.*

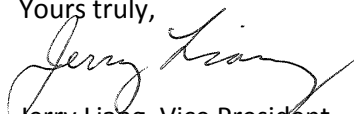
Alamo Capital **has not** held net long or net short State of Illinois CDS proprietary credit protection positions between January 1, 2015 and March 31, 2015.

- *Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.*

Alamo Capital **has not** released any publicly available research or marketing reports that reference State of Illinois CDS between January 1, 2015 and March 31, 2015.

If you have any additional questions, please feel free to contact me at (925) 956-0127 or [jliang@alamocapital.com](mailto:jliang@alamocapital.com).

Yours truly,

  
Jerry Liang, Vice President  
Public Finance



190 South LaSalle Street  
25<sup>th</sup> Floor  
Chicago, IL 60603

Tel (312) 609-8508  
Fax (212) 520-0818  
carole.l.brown@barclays.com

barclays.com

April 9, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, IL 60601

Dear Ms. Akey,

Thank you for your letter regarding our firm's State of Illinois credit default swap activities from January 1, 2015 through March 31, 2015. We are pleased to provide the following information in response to the questions referenced therein:

***Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:***

- 1. In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.***

Barclays does not actively make a market in municipal credit default swaps ("CDS"). The firm did not engage in any State of Illinois CDS trades from January 1, 2015 through March 31, 2015.

As we have previously noted in our submissions to the State, in January 2011, Barclays' Credit Risk Management Group, a group separate from Barclays' Municipal Finance Department, erroneously entered into an Illinois CDS trade in order to hedge counterparty risk. This trade was unwound a few days later since it had been put on in error. The two trades consisted of \$10 million buy and sell. Other than those trades, the firm has entered into no Illinois CDS trades since August 2009.

Below is the most recent data regarding our gross and net positions from January 1, 2015 through March 31, 2015.

- Gross notional of trades from January 1, 2015 through March 31, 2015 = \$0
- Net notional of trades from January 1, 2015 through March 31, 2015 = \$0
- Net notional of trades outstanding as of March 31, 2015 = \$0

- 2. Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.***

Please see our response to #1.

3. *Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.*

Please see our response to #1.

4. *List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.*

Please see our response to #1.

5. *Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.*

Prior to February 2011, Barclays published a monthly municipal research report that referenced CDS market activity for a group of fifteen major issuers including the State of Illinois. Barclays ceased publishing research that referenced Illinois CDS pricing in February 2011. Our firm did not release any publicly available research or marketing reports referencing State of Illinois CDS from January 1, 2015 through March 31, 2015.

We are available at your convenience to discuss this information further. I may be reached at (312) 609-8508. Thank you.

Sincerely,



**Carole Brown**  
*Managing Director*

Tel (312) 609-8508  
Fax (212) 520-0818  
carole.l.brown@barclays.com



**April 6, 2015**

Jessica Akey, Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
100 W. Randolph Street, Suite 15-100  
Chicago, IL 60601

Re: State of Illinois Credit Default Swaps

Dear Ms. Akey:

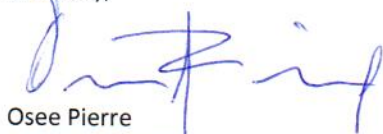
In regards to the State of Illinois Credit Default Swap Questions, please find our responses below:

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.  
*Blaylock Beal Van has not participated in State of Illinois CDS activities, as of the end of the current 3-month period.*
- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.  
*Blaylock Beal Van has not entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.*
- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period  
*Blaylock Beal Van has not had any outstanding gross or net notional amount of proprietary State of Illinois CDS, as of the end of the current 3-month period.*
- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.  
*Blaylock Beal Van has not held net long or net short State of Illinois CDS proprietary credit protection positions, as of the end of the current 3-month period.*
- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.  
*Blaylock Beal Van has not released any publicly available research or marketing reports that reference State of Illinois CDS, as of the end of the current 3-month period.*

If you have any additional questions, please do not hesitate to contact me at (312) 324-0772 or [opierre@brv-llc.com](mailto:opierre@brv-llc.com).

Sincerely,



Osee Pierre  
Senior Vice President



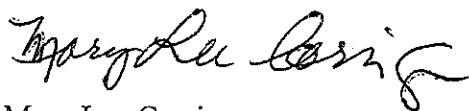
April 14, 2015

Mr. John Sinsheimer  
Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
JRTC, 100 West Randolph, Suite 15-100  
Chicago, IL 60606

Dear Mr. Sinsheimer:

Enclosed please find our firm's response to the questions regarding State of Illinois Credit Default Swap Activity. If you have any questions or need additional information, please let me know. I can be reached at (312) 845-2005 or [marylee.corrigan@bmo.com](mailto:marylee.corrigan@bmo.com).

Sincerely,



Mary Lee Corrigan  
Managing Director/CFO  
Administration

MLC/ays

Enclosure

## **State of Illinois Credit Default Swap Questions**

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

*BMO Capital Markets GKST, Inc. has not participated in any State of Illinois CDS Activity within the past three months ending March 31, 2015.*

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

*No trades were done.*

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

*Not applicable.*

- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

*None.*

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

*No research or marketing reports were done referencing State of Illinois CDS.*

***Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:***

***In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.***

By way of background, BofAML does not take and maintain unhedged long or short positions, unrelated to market making, of Illinois General Obligation ("GO") CDS. Instead, BofAML is a swaps market maker and in that capacity makes regular two-way markets in municipal CDS, including CDS on Illinois GO bonds, and acts as a swaps dealer with respect to Illinois GO CDS. BofAML's trading of Illinois GO CDS, while effected as principal for our own account, is in response to the flow of actual and anticipated counterparty market making transactions, and while BofAML's Illinois GO CDS exposure on a net basis at any given time may be modestly long (BofAML being a net purchaser of unhedged credit protection) or short ( BofAML being a net seller of unhedged credit protection), BofAML seeks to maintain, over time, a more or less balanced book of long and short transactions. For the quarter ending March 31, 2015 the cumulative notional volume of Illinois GO CDS purchases was \$0 and sales was \$5,000,000. As of March 31, 2015, BofAML's outstanding gross notional amount of Illinois GO CDS was \$729,700,000 and the outstanding net notional amount of Illinois GO CDS was a net short position of \$71,900,000 (that is, BofAML was a net seller of Illinois CDS protection as of that date, and thus net long Illinois GO risk, as it would be if it were a holder of Illinois GO bonds).

In addition, we have prime brokerage positions which represent our "back-to back" intermediation of trades between certain hedge fund clients and their counterparties. These transactions are custodial in nature and do not represent risk positions of our firm. As of March 31, 2015, BofAML's prime brokerage outstanding gross notional amount of Illinois GO CDS was \$260,000,000 and the outstanding net notional amount of Illinois GO CDS was \$0 (that is, prime brokerage accounts were flat Illinois GO CDS protection as of that date).

***Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.***

As discussed above, BofAML does not engage in proprietary trading by taking and maintaining unhedged long or short positions, unrelated to market making, of Illinois GO CDS. The activity conducted for BofAML's own account is undertaken (a) to hedge specific, identified State credit exposures held by BofAML, such as State general obligation (GO) bonds, credit facilities or derivative credit exposures, or (b) pursuant to BofAML's ongoing, client- driven market-making activities.

***Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.***

As discussed above, the question is not applicable as BofAML did not engage in proprietary trading.

***List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.***

As discussed above, the question is not applicable as BofAML did not engage in proprietary trading.

***Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.***

During the three-month period ended March 31, 2015, we would have included information about generic Illinois CDS spreads along with information about other state spreads in certain marketing materials, but did not specifically highlight them.

We are not aware that municipal research analysts at BofAML published any research reports referencing State of Illinois CDS during this period.

This letter is being submitted to you with the request that you keep it confidential and not provide or otherwise disclose it to any party, unless you are required to do so by law. If your office should decide to disclose any of the information to any other government agency or person, we also ask that you notify us immediately and provide that agency or person with notice of this request. Furthermore, if any person should request the opportunity to inspect or copy this letter, we ask to be notified immediately and given advance notice of any intended release.



**CABRERA CAPITAL MARKETS, LLC**

BOSTON • CHICAGO • HOUSTON • LOS ANGELES • NEW YORK • PHILADELPHIA • SAN ANTONIO • TAMPA

April 24, 2015

Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Office of Management and Budget  
100 W. Randolph, Suite 15-100  
Chicago, IL 60601

Re: State of Illinois Credit Default Swap Questions January 2015 – March 2015

In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

Cabrera Capital Markets, LLC ("Cabrera") has not participated in State of Illinois Credit Default Swap activities within the past 3 months. The firm has not traded any State of Illinois CDS.

Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

Cabrera has not entered into any proprietary trades for its own account in State of Illinois CDS at any time.

Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

Cabrera has no outstanding gross and no notional amount of proprietary State of Illinois CDS.

List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

At no time in the past 3 months has Cabrera held net long or net short State of Illinois CDS proprietary credit protection positions.

Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

Cabrera has not, within the previous 3, months released any publicly available research or marketing reports that reference State of Illinois CDS.

Sincerely,

  
Martin Cabrera  
Chief Executive Officer  
Cabrera Capital Markets, LLC



April 20, 2015

Jessica Akey  
Deputy Director of Capital Markets  
Governor's Office of Management and Budget  
State of Illinois  
100 W. Randolph Street, Suite 15-100  
Chicago, IL 60601

RE: State of Illinois Credit Default Swap Questions

Dear Ms. Akey:

In regards to the State of Illinois Default Swap Questions, please find our response below:

*Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:*

- *In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.*

CastleOak Securities **has not** participated in State of Illinois CDS activities within the past three months.

- *Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.*

CastleOak Securities **has not** entered into any proprietary trades for its own account in State of Illinois CDS within the past three months.

- *Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.*

CastleOak Securities **does not** have any outstanding gross or net notional amount of proprietary State of Illinois CDS as of the end of the current 3-month period.

- *List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.*

CastleOak Securities **has not** held net long or net short State of Illinois CDS proprietary credit protection positions during the past three months.

- *Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.*

CastleOak Securities **has not** released any publicly available research or marketing reports that reference State of Illinois during the past three months.

If you have any additional questions, please feel free to contact me at (312) 577-2505.

Sincerely,

A handwritten signature in black ink, appearing to read 'Crump', with a stylized, flowing script.

Christopher Crump  
Vice President  
Municipal Finance  
Telephone: (312) 577-2505  
Email: [ccrump@castleoaklp.com](mailto:ccrump@castleoaklp.com)



April 14, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management  
and Budget  
James R. Thompson Center  
100 West Randolph – Suite 15-100  
Chicago, IL 60601

**Re: Illinois Credit Default Swaps**

Dear Ms. Akey:

In response to your letter dated April 6, 2015, below are responses for Citi's market activities related to credit default swaps per State Statute on State of Illinois General Obligation Bonds and Build Illinois bonds from January 01, 2015 through March 31, 2015.

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

Cumulative: 38,375,000

Outstanding Gross: 1,458,034,000

Net Notional: 11,366,000 (Long)

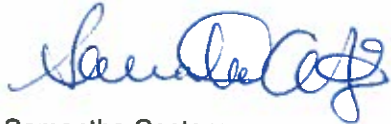
- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.  
No
- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.  
N/A
- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.  
N/A

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

No research

The signed letter will be sent via UPS Next Day Delivery.

Sincerely,

A handwritten signature in blue ink, appearing to read "Samantha Costanzo", with a stylized flourish at the end.

Samantha Costanzo  
Managing Director



30 South Meridian Street, Suite 600  
Indianapolis, Indiana 46204

Telephone: 317.634.4400  
Toll-Free: 1.800.800.CITY (2489)

April 6, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
James R. Thompson Center, Suite 15-100  
100 W. Randolph St.  
Chicago, IL 60601

Dear Ms. Akey:

City Securities Corporation does not, and has never, participated in any credit-default swap market-making activities, and thus has not participated in any State of Illinois CDS activities from the period of January 1, 2015 through March 31, 2015. Further, City Securities Corporation has never released any publically available research or marketing reports that reference State of Illinois CDS. Please let us know if you have any additional requests.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Schumaker", is written over a light blue horizontal line.

**Mike Schumaker**  
Senior Vice President

Cc: Kevin Wright



**Date: April 7, 2015**

**Drexel Hamilton CDS Response**

**FY2015 QTR 3 (January 1, 2015 through March 31, 2015)**

**State of Illinois Credit Default Swap Questions**

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps (“CDS”) within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.
  - **Drexel Hamilton has not participated in credit default swap market-making activities related to any State of Illinois credit default swaps (“CDS”) within the past 3 months.**
- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.
  - **Drexel Hamilton has not entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.**
- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.
  - **Drexel Hamilton has does not have any gross and/or net notional amount of proprietary State of Illinois CDS either net short or net long credit protection, as of the end of the current 3-month period.**
- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.
  - **Drexel Hamilton has not held at any time within the past 3 months a net long or net short State of Illinois CDS proprietary credit protection positions.**
- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

- **Drexel Hamilton has not within the previous 3 months, released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports.**

***Frederick D. Phelan***

***Vice President***

8421 Amber Hill Court, Suite 205 | Lincoln, NE 68526

+1 402 421-3819 (Direct) | +1 610 745-4225 (Mobile)

[fphelan@drexelhamilton.com](mailto:fphelan@drexelhamilton.com)

# ESTRADA • HINOJOSA

INVESTMENT BANKERS

April 8, 2015

Ms. Jessica Akey, Director of Capital Markets  
State of Illinois  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

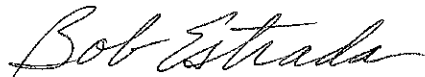
Dear Ms Akey:

Estrada Hinojosa & Company, Inc. is pleased to respond to your letter of April 6, 2015 addressed to our Firm.

With regard to our activities in the previous quarter, please note that Estrada Hinojosa is a FINRA-registered broker engaged solely in municipal bond underwritings and has never participated in credit default swap ("CDS") market-making activities related to the State of Illinois or any other bond issuer, and the Firm has no intention to deal in CDS activities at any time in the future. Estrada Hinojosa does not publish research reports related to the CDS market.

Please do not hesitate to contact us if you have any other questions. Best wishes for your continued success.

Sincerely,



Robert A. Estrada

Cc: Kevin Wright

Thomas B. Nolan, Firm  
Fernando Grillo, Firm  
Scott Felt, Firm

ESTRADA HINOJOSA & COMPANY, INC.

1717 Main Street • Suite 4700, Lockbox 47 • Dallas, Texas 75201  
(214) 658-1670 • (800) 676-5352 • Fax (214) 658-1671

Member FINRA/SIPC

DALLAS

AUSTIN

CHICAGO

HOUSTON

MIAMI

NEW YORK

SAN ANTONIO

SAN DIEGO



July 1, 2015

Jessica Akey  
Capital Markets Manager  
State of Illinois  
Governor's Office of Management and Budget  
100 W. Randolph St., JRTC Suite 15-100  
Chicago, Illinois 60601

**Re: State of Illinois Credit Default Swap Questions**

Dear Ms. Akey,

Enclosed you will find responses to Fifth Third Securities, Inc's market activities from January 1, 2015 through March 31, 2015 related to credit default swaps, as outlined by the State Statute on State of Illinois General Obligation bonds and Build Illinois bonds.

Should you have any questions or if I can assist you in any way, please contact me at (312) 704-5955. We look forward to working with the State and the underwriting team on the State's upcoming financing transactions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nathan Flynn', with a long horizontal line extending to the right.

Nathan Flynn | Managing Director  
Fifth Third Securities | Public Finance  
222 South Riverside Plaza  
Chicago, Illinois 60606  
(312) 704-5955 | [Nathan.Flynn@53.com](mailto:Nathan.Flynn@53.com)

## State of Illinois Credit Default Swap Questions

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trade and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

Fifth Third Securities, Inc. and related entities have not participated in any activities related to credit default swaps, including those related to the State of Illinois.

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3 month period.

Fifth Third Securities, Inc. and related entities have not entered into any proprietary trades for its own account in State of Illinois CDS.

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

Fifth Third Securities, Inc. and related entities have no positions in any CDS, including those related to the State of Illinois.

- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

Fifth Third Securities, Inc. and related entities have not held State of Illinois proprietary credit protection positions during the past 3 months.

- Indicate whether within the past 3 months, the firm has released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

Fifth Third Securities, Inc. and related entities have not released any publicly available research or marketing report that reference State of Illinois CDS.





**George K. Baum & Company**  
INVESTMENT BANKERS SINCE 1928

April 7, 2015

Kevin Wright  
Bond Analyst  
State of Illinois  
Governor's Office of Management and Budget  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, IL 60601

Re: State of Illinois Credit Default Swap Questions

Dear Mr. Sinsheimer:

Enclosed please find our responses to the above-referenced questions related to credit default swaps per State Statute on State of Illinois General Obligation Bonds and Build Illinois Bonds from January 1, 2015 through March 31, 2015.

We appreciate the opportunity to submit our response to the State of Illinois.

Regards,

Albert A. Boumenot  
Senior Vice President  
Illinois Public Finance

AAB/cb

Enclosure

### **State of Illinois Credit Default Swap Questions and Answers**

- a) *In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.*

**None. George K. Baum & Company has never participated in State of Illinois CDS activities.**

- b) *Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.*

**None. George K. Baum & Company has never entered into any such trades.**

- c) *Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.*

**None. George K. Baum & Company has never participated in any such trading activity.**

- d) *List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.*

**None. George K. Baum & Company has never participated in State of Illinois CDS activities.**

- e) *Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.*

**None. George K. Baum & Company has never generated any such reports.**

**April 7, 2015**



April 10, 2015

Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

Dear Ms. Akey:

I am pleased to respond on behalf of Goldman, Sachs & Co. about our firm's activities related to State of Illinois municipal credit default swaps ("CDS").

***Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months.***

***Please include and/or indicate the following:***

- ***In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.***

As it has done in respect of many states' CDS, Goldman Sachs participated in market-making activities with respect to State of Illinois CDS in the past fiscal quarter (January 1, 2015 through March 31, 2015). Goldman Sachs's cumulative notional volume of trades in State of Illinois CDS during that time was \$12.0 million. Goldman Sachs's net notional position as of March 31, 2015 in Illinois CDS was \$27.9 million, and our gross notional position in Illinois CDS was \$2.84 billion.

It is not feasible to assess whether Goldman Sachs is long or short exposure to State of Illinois credit solely by reference to notional amounts of CDS, as other considerations, including the various maturities of our CDS positions and our risks related to market-making activities in the State's bonds, are key determinants and drivers of the firm's risk profile.

- ***Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.***

Goldman Sachs has not entered into any trades for its own proprietary account in State of Illinois CDS during the past fiscal quarter. As noted above, Goldman Sachs has entered into Illinois CDS contracts from time to time, stepping in with its own capital to execute client trades as a principal in order to promote market liquidity in a market-making capacity.

- ***Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.***

Please see the above answers.

- ***List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.***

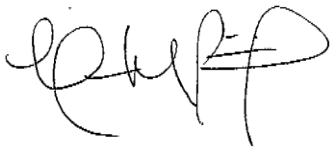
Please see the above answers.

- ***Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.***

During the previous fiscal quarter, Goldman Sachs has not published any research or marketing reports concerning State of Illinois CDS. In that regard, the firm's Global Investment Research Division does not create or publish research on municipal issuers. From time to time, various groups within the firm's Securities Division have provided marketing materials to clients to educate them generally about the municipal asset class and the products available to gain or limit exposure to that asset class, including tax-exempt bonds, interest rate derivatives, CDS and BABs. These materials are available to the firm's institutional sales force and are on occasion in turn provided to certain investing clients.

Thank you for the opportunity to respond to your questions. We look forward to continuing to serve the State of Illinois and the larger municipal market.

Sincerely,

A handwritten signature in black ink, appearing to read 'CPineiro', with a stylized flourish at the end.

Carlos Pineiro  
Vice President



HILLIARD LYONS

211 West Wacker Drive | Suite 1200 | Chicago, IL 60606  
312.346.3570 | fax 312.977.4813

April 22, 2015

Mr. Kevin Wright, Capital Budget Analyst  
State of Illinois  
Governor's Office of Management and Budget  
100 W. Randolph Street, Suite 15-100  
Chicago, IL 60601

Re: State of Illinois Credit Default Swap Questions

Dear Kevin:

In regards to the State of Illinois Default Swap Questions, please find our response below.

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months, please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

*Hilliard Lyons **has not** participated in State of Illinois CDS activities between January 1, 2015 and March 31, 2015.*

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

*Hilliard Lyons **has not** entered into any proprietary trades for its own account in State of Illinois CDS between January 1, 2015 and March 31, 2015.*

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

*Hilliard Lyons **does not** have any outstanding gross or net notional amount of proprietary State of Illinois CDS between January 1, 2015 and March 31, 2015.*



- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

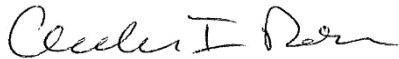
*Hilliard Lyons **has not** held net long or net short State of Illinois CDS proprietary credit protection positions between January 1, 2015 and March 31, 2015.*

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

*Hilliard Lyons **has not** released any publicly available research or marketing reports that reference State of Illinois CDS between January 1, 2015 and March 31, 2015.*

If you have any additional questions, please feel free to contact me at 312.346.3755 or via email [arorke@hilliard.com](mailto:arorke@hilliard.com).

Sincerely,



Alexander I. Rorke  
Senior Managing Director  
Municipal Securities Group

cc: Jennifer Card  
Jessica Akey

Dear Sir/Madam,

Per your request below we have provided the following response in reference to our firm's market activities related to credit default swaps per State Statute on State of Illinois General Obligation bonds and Build Illinois bonds from January 1, 2015 through March 31, 2015.

**State of Illinois Credit Default Swap Questions**

In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

**IFS Securities, Inc. has not participated in these activities.**

Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

**IFS Securities, Inc. has not entered into any proprietary trades in State of Illinois CDS.**

Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

**This question is not applicable to IFS Securities, Inc.**

List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

**IFS Securities, Inc. has not held net long or net short State of Illinois CDS proprietary credit protection positions within the past 3 months.**

Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

**IFS Securities, Inc. has not released any publically available research or marketing reports referencing State of Illinois CDS.**

Sincerely,

Craig Walker  
Vice President  
IFS Securities, Inc.

April 21, 2015

Jessica Akey, Deputy Director of Capital Markets  
Governor's Office of Management and Budget  
James R. Thompson Center  
100 W. Randolph, Suite 15-100  
Chicago, IL 60601

**RE: Janney Montgomery Scott ("Janney") Illinois Credit Default Swap ("CDS") Activity for 3Q 2015**

Dear Ms. Akey:

Please accept the following responses as relating to the State's second fiscal quarter of 2015 (January 1 – March 31, 2015). Janney has not and does not participate in the CDS market. Therefore, we have not participated in any way in the CDS market with regard to the State of Illinois.

- **Q:** In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.
- **A: None**
- **Q:** Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.
- **A: None**
- **Q:** Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 6-month period.
- **A: None**
- **Q:** List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.
- **A: None**
- **Q:** Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.
- **A: None**

Sincerely,



Vivian Altman  
Managing Director/Public Finance  
Tel: 646-840-3202  
[valtman@janney.com](mailto:valtman@janney.com)

Cc: Kevin Wright

April 8, 2015

Kevin Wright  
State of Illinois  
Governor's Office of Management and Budget  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

Dear Mr. Wright,

I am providing you information about Jefferies LLC market activities related to credit default swaps per State Statute of Illinois General Obligation bonds and Build Illinois bonds from January 1, 2015 through March 31, 2015. Please see page 2.

Sincerely,

A handwritten signature in black ink that reads "Stephen A. Wood". The signature is written in a cursive, flowing style.

Stephen A. Wood  
Managing Director  
Jefferies LLC  
520 Madison Avenue  
New York, NY 10022

Re: State of Illinois General Obligation bonds and Build Illinois bonds for the period of January 1, 2015 through March 31, 2015

## State of Illinois Credit Default Swap Questions

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

Jefferies reports: **NONE**

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

Jefferies reports: **NONE**

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

Jefferies reports: **NONE**

- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

Jefferies reports: **NONE**

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachment.

Jefferies reports: **NONE**

## Credit Default Swap Report: State of Illinois

Firm name:	J.P. Morgan Securities LLC
Three-month period:	FY15 QTR3: January 2015 – March 2015
Please answer the following questions on this form and attach additional pages as necessary.	
In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.	In the State's FY 2015 Q3 the firm had a cumulative net notional volume of \$6,000,000 long credit protection. The firm has an outstanding gross notional of \$939,200,000 and net notional of \$44,200,000 long credit protection.
Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.	None
Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.	None
List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions	None
Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.	None

April 24, 2015

Governor's Office of Management and Budget  
Attn: Jessica Akey, Deputy Director of Capital Markets  
James R. Thompson Center  
Suite 15-100  
100 W. Randolph Street  
Chicago, Illinois 60601

Ms. Akey:

I provide herein response to your letter dated April 6, 2015 requesting KeyBanc Capital Markets' activities related to State of Illinois credit default swaps (from January 1, 2015 through March 31, 2015).

Specifically and in direct response to the following query:

**State of Illinois Credit Default Swap Questions**

*Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:*

- *In the event of your firm's participation in State of Illinois CDS activities within the past 3 months, please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and notional amount of State of Illinois CDS as of the end of the current 3-quarter period.*
- *Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS as of the end of the current 3-quarter period.*
- *Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short of long credit protection as of the end of the current 3-month period.*
- *List at all times during the past 3 months during which the firm held net long or short State of Illinois proprietary credit protection positions, the amount of such positions, and whether those positions were net long or short credit protection positions.*
- *Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.*

**Neither KeyCorp nor any of its subsidiaries, including KeyBanc Capital Markets Inc., participate in, make markets in or provide research for municipal credit default swaps.**

Sincerely,



**Thomas M. Coverick**  
Managing Director  
KeyBanc Capital Markets Inc.



111 West Jackson Blvd., Suite 1901  
Chicago, IL 60604  
T 312.913.4900 F 312.913.4928  
Toll Free 888.294.8898  
[www.loopcapital.com](http://www.loopcapital.com)

April 7, 2015

Jessica Akey  
*Deputy Director of Capital Markets*  
State of Illinois – Governor's Office of Management and Budget  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, IL 60601  
United States

Dear Ms. Akey:

Please be advised that from January 1, 2015 through March 31, 2015, Loop Capital Markets LLC has not engaged in any market making activities related to any State of Illinois credit default swaps. If you need any additional information please feel free to call me at (312) 356 – 5009.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence Bourne", with a large, stylized loop at the end.

Clarence Bourne  
Managing Director  
Phone: (312) 356-5009  
Email: [clarence.bourne@loopcapital.com](mailto:clarence.bourne@loopcapital.com)



## **State of Illinois Credit Default Swap Questions**

**January 1, 2015 through March 31, 2015**

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps (“CDS”) within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

*Mesirow Financial has not held any State of Illinois CDS securities within the past 3 months.*

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

*Mesirow Financial has not entered into any proprietary trades for its own account in State of Illinois CDS as of the end of the current 3-month period.*

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

*Mesirow Financial does not have any outstanding State of Illinois CDS as of the end of the current 3-month period.*

- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

*Mesirow Financial has not held State of Illinois CDS proprietary credit positions during the past 3 months.*

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

*Mesirow Financial has not released any publicly available research or marketing reports that reference State of Illinois CDS in the past 3 months.*

Morgan Stanley

April 30, 2015

**By Email and Overnight Mail**

Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, IL 60601


**Re: Request for CDS Information**

Dear Ms. Akey:

We write on behalf of Morgan Stanley & Co., LLC. ("MSCO") to provide information regarding MSCO's activity in single-name credit default swaps related to the State of Illinois for the period of January 1, 2015 through March 31, 2015 as required by Illinois statute.

The CDS transactions referenced herein were not affected by MSCO. Rather, they were affected by affiliates of MSCO known as Morgan Stanley Capital Services, LLC. and Morgan Stanley International, PLC, neither of which act as an underwriter for State transactions. Cumulative notional volume<sup>1</sup> totaled 3,000,000 net sales for the State of Illinois CDS trades during the Review Period. The outstanding gross and net notional amount<sup>2</sup> of State of Illinois CDS as of the end of the Review Period is \$2,074,045,850 and \$14,931,000 respectively. There were no proprietary transactions in State of Illinois CDS affected during the review period, and there were no research or marketing reports referencing the State of Illinois CDS over the period.

Respectfully submitted,



Denise Garrett  
Executive Director  
Morgan Stanley

cc: Kevin Wright

---

<sup>1</sup> This number reflects the sum of the absolute value of the notional of all purchases and sales for CDS related to the State of Illinois.

<sup>2</sup> We interpret gross notional value to mean the sum of the absolute values of the notional of the individual transactions. We interpret the net notional value to mean the net amount of underlying exposure on the State of Illinois when transacting in CDS.



# North South Capital LLC

## State of Illinois Credit Default Swap Questions

North South Capital LLC has not participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months (January 1, 2015 through March 31, 2015).

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period. **None- North South Capital LLC has not participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months**
- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.  
**North South Capital LLC has not entered into any proprietary trades for its own account in State of Illinois CDS as of the end of the current 3-month period.**
- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period. **None- North South Capital LLC has not entered into any proprietary trades for its own account in State of Illinois CDS as of the end of the current 3-month period.**
- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions. **None- North South Capital LLC has not entered into any proprietary trades for its own account in State of Illinois CDS as of the end of the current 3-month period.**
- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.  
**North South Capital within the previous 3 months, has not released any publicly available research or marketing reports that reference State of Illinois CDS.**

Jane Ott  
President



4-7-15

Mr. John Sinsheimer, Director of Capital Markets  
State of Illinois Governor's Office of Management and Budget  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

Dear Mr. Sinsheimer:

Oppenheimer & Co. Inc. participates in the credit default swap market as part of its overall participation in the capital markets. Our response to your specific questions on our market-making activities in State of Illinois credit default swaps ("CDS") from January 1, 2015 to March 31, 2015 are as follows:

- In the event of your firm's participation in the State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

None.

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

We have not.

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

We have none.

- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

We had no positions.

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

We have not released any research or marketing reports on State of Illinois CDS.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Holland". The signature is written in a cursive, flowing style with a large, stylized "H" and "D".

Jack Holland  
Managing Director  
Oppenheimer & Co. Inc.

April 7, 2015

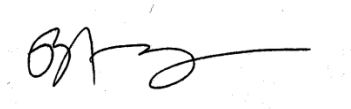
Ms. Jessica Akey  
Deputy Director of Capital Markets  
Governor's Office of Management and Budget  
State of Illinois  
Sent via e-mail to: [kevin.wright@illinois.gov](mailto:kevin.wright@illinois.gov)

Dear Ms. Akey:

This letter is in response to your letter dated April 6, 2015 requesting information about Piper Jaffray's market activities related to credit default swaps per State Statute on State of Illinois General Obligation bonds and Build Illinois bonds from January 1, 2015 through March 31, 2015. We have reviewed our records, and the answer is "none" to all five questions.

If you have any further questions, please let me know.

Sincerely,



Brad Langner  
Senior Vice President  
Public Finance Investment Banking  
303 405-0860





April 8, 2015

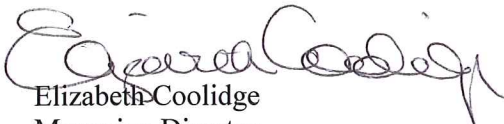
Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
100 W. Randolph St., Suite 15-100  
Chicago, IL 60601

RE: PNC Capital Markets LLC - State of Illinois CDS Disclosure for Third Quarter FY2015

Dear Ms. Akey:

This letter is in response to an email from your office dated April 6, 2015. Based on conversations with the appropriate personnel of PNC Capital Markets LLC and PNC Bank, National Association, I can inform you that neither entity has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") during the period from January 1, 2015 through March 31, 2015 or released any publicly available research or marketing reports that reference State of Illinois CDS. Thus, neither entity has any information to report in response to the other four questions posed. If you need any further assistance from PNC, please contact me by one of the means listed below.

Respectfully,



Elizabeth Coolidge  
Managing Director

312-338-2262  
elizabeth.coolidge@pnc.com

cc: Patricia Nazar  
Vice President

**PNC Capital Markets LLC**  
Member of The PNC Financial Services Group, Inc.  
1 North Franklin Street, Suite 2900, Chicago, Illinois 60606

Products and Services are offered through PNC Capital Markets LLC, a registered broker dealer, member FINRA and SIPC, and subsidiary of The PNC Financial Services Group, Inc. Investments and Insurance: Not FDIC Insured. No Bank or Federal Government Guarantee. May Lose Value.

# PODESTA & CO.

208 SOUTH LASALLE STREET  
SUITE 1460  
CHICAGO, IL 60604  
(312) 899-0133  
FAX (312) 899-0910  
podestaco.com

April 7, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
JRTC, 100 W. Randolph, Suite 15-100  
Chicago, IL 60601

Dear Ms. Akey,

Podesta & Co. has not participated in any credit default swap market-making activities related to any State of Illinois credit default swaps ("DCS") within the past 3 months, January 1 through March 31, 2015 and has never released any publicly available research or marketing reports that reference the State of Illinois CDS.

Sincerely,



Carol Podesta Foley  
President





April 6, 2015

Jessica Akey, Deputy Director of Capital Markets State of Illinois  
Governor's office of Management and Budget  
JRTC, Suite 15-100  
100 W. Randolph St.  
Chicago, IL 60601

Ms. Akey:

Please find our response below to your communication dated April 6, 2015 regarding Ramirez & Co's ("Ramirez") use of credit default swaps ("CDS") for the time period of January 1, 2015 to March 31, 2015.

- 1) In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.
  - a. **N/A - Ramirez does not and has not engaged in CDS trades for any municipal issuer.**
- 2) Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.
  - a. **N/A - Ramirez does not and has not engaged in CDS trades for any municipal issuer.**
- 3) Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.
  - a. **N/A - Ramirez does not and has not engaged in CDS trades for any municipal issuer.**
- 4) List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.
  - a. **N/A - Ramirez does not and has not engaged in CDS trades for any municipal issuer.**
- 5) Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments
  - a. **N/A - Ramirez has not released or produced any of the reports referenced above.**

Please feel free to reach out to Phil Culpepper directly at 312-630-2004 if you have any questions or concerns regarding this disclosure.

Sincerely,

Phil Culpepper  
Managing Director- Ramirez & Co., Inc.

CC: Kevin Wright - GOMB  
Ramirez Compliance Department

# RAYMOND JAMES®

**TO:** John Sinsheimer  
Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget

**FROM:** Raymond James  
Kevin Thompson, Managing Director

**RE:** State of Illinois Credit Default Swap Questions

**DATE:** April 7, 2015

Please find information related to Raymond James activities related to credit default swaps per State Statute on State of Illinois General Obligation bonds and Build Illinois bonds from January 1, 2015 through March 31, 2015.

This information is being furnished to you in hard copy form and to you and Sophia Ronis via email.

## State of Illinois Credit Swap Questions

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

In the event of your firm's participation in State of Illinois CDS activities within the past 3 months, please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

Raymond James has **NOT** participated in CDS market-making activities related to any State of Illinois CDS within the past 3 months.

Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

Raymond James has **NOT** entered into any proprietary trades for its own account in the State of Illinois CDS as of the end of the current 3-month period.

Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

Raymond James does **NOT** have outstanding gross or net notional amount of proprietary State of Illinois CDS.

List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

Raymond James has **NOT** held net long or short State of Illinois CDS proprietary credit protection positions at any time during the past 3 months.

Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

Raymond James has **NOT** released any publicly available research or marketing reports that reference State of Illinois CDS in the past 3 months.



**Kevin W. Hoecker**  
Director  
RBC Capital Markets, LLC  
Phone: 312-559-3876  
Fax: 312-559-1650  
[kevin.hoecker@rbccm.com](mailto:kevin.hoecker@rbccm.com)

April 9, 2015

Kevin Wright  
Bond Analyst  
State of Illinois  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

RE: State of Illinois Credit Default Swap Inquiry

Dear Kevin:

On behalf of RBC Capital Markets, LLC please allow the following to reply to the April 6, 2015 correspondence related to the above captioned matter.

RBC Capital Markets, LLC has not participated in credit default swap market-making activities related to any State of Illinois credit default swap within the past 3 months (January 1, 2015 – March 31, 2015). In addition, RBC Capital Markets has no responsive information to the five bullet points contained in the April correspondence. This does not reflect a categorical decision by the firm not to recommend or sell credit default swaps in appropriate circumstances, nor has the firm made any determination regarding marketing making activities of credit default swaps in the future.

Please advise if you are in need of any further information.

Regards,

A handwritten signature in black ink, appearing to be 'KH', with a long horizontal flourish extending to the right.

Kevin Hoecker  
Director  
Municipal Finance  
RBC Capital Markets, LLC  
312-559-3876

cc: Ralph Desena  
Mark Maroney  
Brain Hellberg

April 8, 2015

Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
100 W. Randolph  
JRTC, Suite 15-100  
Chicago, Illinois 60601

Dear Ms. Akey:

Below please find our responses to the request for information of Rice Financial Product Company's market activities related to credit default swaps per State Statute on State of Illinois General Obligation bonds and Build Illinois bonds from January 1, 2015 through March 31, 2015.

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

None.

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

No.

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

None.



- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

None.

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

No.

Please feel free to contact me if you have any questions or require additional information.

Thank you.

Sincerely,

A handwritten signature in blue ink, reading "James Donald Rice, Jr." The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

James Donald Rice, Jr.  
Chief Executive Officer



Thomas J. Gavin  
Managing Director  
Public Finance

April 7, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
Governor's Office of Management and Budget  
Jr. Thompson Center, Suite 15-100  
100 West Randolph  
Chicago, IL 60601

Dear Ms. Akey,

We received your written request for information regarding our firm's market activities related to credit default swaps ("CDS") on State of Illinois General Obligation Bonds and Build Illinois Bonds from January 1, 2015 through March 31, 2015. Below we provide Robert W. Baird's ("Baird") responses to your CDS questions.

*Q: In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.*

A: Baird has not participated in State of Illinois CDS activities within the past 3 months.

*Q: Disclose whether your firm entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.*

A: Baird has not entered into any proprietary trades for its own account in State of Illinois CDS.

*Q: Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.*

A: Baird does not have any outstanding amounts of proprietary State of Illinois CDS.

*Q: List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.*

A: Baird has not held State of Illinois CDS proprietary credit protection positions during the past 3 months.

*Q: Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.*

A: Baird has not released any publicly available research or marketing reports that reference State of Illinois CDS within the previous 3 months.

Should you require any additional information, please feel free to contact me.

Sincerely,

Thomas J. Gavin  
Managing Director  
Robert W. Baird & Co.

Robert W. Baird & Co. Incorporated  
300 East Fifth Avenue, Suite 200  
Naperville, IL 60563-3181  
Main (630) 778 9100  
Toll-Free (800) 686 4346  
Fax (630) 848 6450  
[tgavin@rwbaird.com](mailto:tgavin@rwbaird.com)

April 16, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

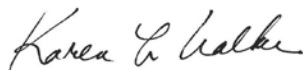
Dear Jessica:

Below please find Siebert Brandford Shank's response to the State of Illinois request for information regarding our firm's market activities related to credit default swaps ("CDS") from January 1, 2015 through March 31, 2015.

Siebert Brandford Shank does not participate in CDS market-making activities; accordingly, we have not participated in CDS market-making activities over the past three months. During this timeframe, our firm's cumulative notional volume of State of Illinois CDS trades is \$0 as is our firm's outstanding gross and net notional amount of State of Illinois CDS. Our firm has not entered into any proprietary trades for our own account in State of Illinois CDS as of the end of the current three-month period. Siebert Brandford Shank has never held net long or short State of Illinois CDS proprietary credit protection positions nor has our firm released any publicly available research or marketing reports that reference State of Illinois CDS over the past three months.

Please feel free to contact us if you have any questions or require additional information. We look forward to working with you and the State of Illinois on future financings.

Thank you,



Karen Walker  
Managing Director

cc: Kevin Wright – [Kevin.Wright@Illinois.gov](mailto:Kevin.Wright@Illinois.gov)

# SternBrothers&Co

8000 MARYLAND AVENUE, SUITE 800  
ST. LOUIS, MISSOURI 63105-3911  
(314) 727-5519 • FAX (314) 727-7313  
WWW.STERNBROTHERS.COM

April 6, 2015

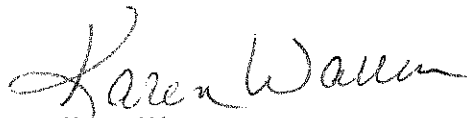
Mr. Kevin Wright  
State of Illinois  
Governor's Office of Management and Budget

Dear Mr. Wright:

Enclosed please find Stern Brothers & Co.'s response to questions regarding State of Illinois Credit Default Swap Activity.

If you need any additional information, please contact me at 314-743-3051.

Sincerely,

A handwritten signature in cursive script that reads "Karen Warren".

Karen Warren  
Chief Compliance Officer  
Stern Brothers & Co.

*Enclosure*



## **State of Illinois Credit Default Swap Questions**

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of end of the current 3-month period.

*Stern Brother's & Co. did not participate in State of Illinois CDS activities during the 1<sup>st</sup> quarter of 2015.*

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

*Stern Brothers & Co. has not entered into any proprietary trades for its own account in State of Illinois CDS as of the end of March 2015.*

- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

*Stern Brothers & Co. has not participated in State of Illinois CDS activities and therefore does not have any information to disclose in regards to our net position.*

- List all time period during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

*Stern Brothers & Co. has not participated in State of Illinois CDS activities and therefore does not have any information to disclose in regards to time periods.*

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

*Stern Brothers & Co. has not released any research or marketing reports that reference State of Illinois CDS.*



April 20, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Budget and Management  
JRTC, Suite 15-100  
100 W. Randolph  
Chicago, IL, 60601

Dear Ms. Akey:

In response to your request for information on April 6, 2015, Sterne Agee has addressed the questions provided. Please see the enclosed page for Sterne Agee's response. We continue to look forward to the opportunity to serve the State, and if we can be of any further assistance or can provide any other information, please let us know.

Thank you,

A handwritten signature in blue ink, reading "Gary Rehm".

Gary Rehm  
Vice President, Public Finance  
Sterne, Agee & Leach, Inc.  
(205) 949-3573  
grehm@sterneagee.com



## STATE OF ILLINOIS CREDIT DEFAULT SWAP QUESTIONS

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*In the event of your firm's participation in State of Illinois CDS activities within the past 3 months, please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period*

Sterne Agee does not participate in State of Illinois CDS activities and, therefore, has zero cumulative notional volume of State of Illinois CDS trades and the Firm's outstanding gross and net notional amount of State of Illinois CDS is also zero.

*Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period*

Sterne Agee has not entered into any proprietary trades for our own account in State of Illinois CDS from January 1, 2015 through March 31, 2015

*Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period*

Sterne Agee had no outstanding gross or notional amount of proprietary State of Illinois CDS as of the 3-month periods ending March 31, 2015

*List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions*

At no point from January 1, 2015 through March 31, 2015 did Sterne Agee hold a net long or net short State of Illinois CDS proprietary credit protection position

*Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments*

Sterne Agee has not, from January 1, 2015 through March 31, 2015, released any publicly available research or marketing reports that reference State of Illinois CDS.



6 April 2015

Mr. Kevin Wright  
Bond Analyst  
Governor's Office of Management and Budget  
James R. Thompson Center, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

Dear Kevin:

On behalf of Stifel Nicolaus & Company, Incorporated ("Stifel") we are pleased to submit our response to the State of Illinois' request for information regarding our firm's CDS activities for the period January 1, 2015 through March 31, 2015. Stifel does not currently trade Illinois CDS. Please find below our responses to the questions raised in your letter.

### State of Illinois Credit Default Swap Questions

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps ("CDS") within the past 3 months. Please include and/or indicate the following:

- In the event of your firm's participation in State of Illinois CDS activities within the past 3 months please disclose your firm's cumulative notional volume of State of Illinois CDS trades and the firm's outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.  
**Response: Stifel has NOT traded State of Illinois CDS within this period**
- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.  
**Response: Stifel has NOT entered into any proprietary State of Illinois CDS trades within this period**
- Disclose your firm's outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.  
**Response: Stifel has NO State of Illinois CDS positions during this period**
- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.  
**Response: Stifel has NOT held net long or net short State of Illinois CDS positions within this period**
- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.  
**Response: Stifel has NOT released research referencing the State of Illinois CDS during this period**

Thank you for the opportunity to serve the State. We welcome the chance to be of assistance to you and your team.

Sincerely,



Omar Daghestani  
Managing Director  
(312) 454-3845



Jeremy Newton  
Director  
(312) 454-3849



Rushda Mustafa  
Assistant Vice President  
(312) 454-3874

April 24, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
Springfield, IL 62706

Dear Ms. Akey:

US Bancorp ("USB" or the "Firm") and its Municipal Securities Group ("MSG"), which operates under U.S. Bancorp Investments, Inc. and U.S. Bank Municipal Securities Group, a division of U.S. Bank National Association, have not engaged in any State of Illinois Credit Default Swap activity between January 1, 2015-March 31, 2015.

Please feel free to contact us should you have any questions or require any additional information on this or any other matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Chatalas".

Paul Chatalas, *Director*  
*Midwest Region Public Finance*  
(312) 325-2302  
[paul.chatalas@usbank.com](mailto:paul.chatalas@usbank.com)

**Government & Institutional Banking**  
Public Finance  
10 S. Wacker Drive  
15<sup>th</sup> Floor  
Chicago, Illinois 60606



April 10, 2015

Re: State of Illinois Credit Default Swap Inquiry for January - March, 2015

Dear Mr. Wright:

I am responding to your email below in which you request information about Wells Fargo Bank, N.A.'s ("WFBNA") market activities related to State of Illinois ("IL") credit default swaps ("CDS") for the time period noted above.

After performing appropriate due diligence around your request, we can advise you that:

- We have not identified any information indicating that WFBNA has participated in CDS market making activities related to any IL CDS in the relevant time period
- WFBNA has not released any publicly available research or marketing reports that reference IL CDS in the relevant time period

I trust this is responsive to your inquiry. Please let me know if you have any further questions.

Sincerely,  
Victor Chang

A handwritten signature in black ink, appearing to read "V. H. Chang", written over the printed name.

Victor H. Chang, Director  
Wells Fargo Securities - Midwest Public Finance  
10 South Wacker Drive, 15<sup>th</sup> Floor, Chicago, IL 60606  
312-845-4587 (office); 312-636-5356 (cell)

Wells Fargo Securities is the trade name for certain securities-related capital markets and investment banking services of Wells Fargo & Company and its subsidiaries, including Wells Fargo Bank, N.A.



# *William Blair*

April 14, 2015

Ms. Jessica Akey  
Deputy Director of Capital Markets  
State of Illinois  
Office of Management and Budget  
James R. Thompson Center  
100 West Randolph Street - Suite 15-100  
Chicago, Illinois 60601

Dear Ms. Akey:

This letter responds to your letter dated April 6, 2015 requesting certain information concerning our firm's activities related to credit default swaps of the State of Illinois General Obligation and Build Illinois programs from January 1, 2015 through March 31, 2015

William Blair & Company has never engaged in any market activities related to State of Illinois credit default swaps. The answer is "NONE" to all of the questions contained in the attachment to your letter. We are happy to provide any additional information that you think helpful.

We appreciate the opportunity to assist the State of Illinois with its capital markets needs, and in so doing we always try to align our interests with those of the State.

Very truly yours,



Thomas E. Lancot

TEL:jts





April 15, 2015

Ms. Jessica Akey, Deputy Director of Capital Markets  
State of Illinois  
Governor's Office of Management and Budget  
JTRC, Suite 15-100  
100 W. Randolph  
Chicago, Illinois 60601

Re: State of Illinois Credit Default Swap Questions  
Quarterly Disclosures for:  
January 1, 2015 through March 31, 2015

Dear Ms. Akey:

In response to the State of Illinois letter dated April 6, 2015, requesting information concerning the Firm's activities relating to State of Illinois Credit Default Swaps ("CDS"), The Williams Capital Group, L.P. ("Williams Capital") discloses the following:

- The Williams Capital Group, L.P. has not participated in any State of Illinois credit default swap transactions within the period covering this disclosure, nor has the Firm entered into any proprietary trades for its own account in State of Illinois CDS.
- With respect to the release of publicly available research or marketing reports that reference State of Illinois CDS, Williams Capital has not released any publicly available research information referencing State of Illinois CDS.
- Williams Capital is not aware of any plans by any of its entities to transact in credit default swaps related to the State of Illinois.

Please see the Firm's response to the State of Illinois Credit Default Swap Questions for each of the quarterly periods noted above.

Sincerely,

**Jacqueline B. Knights**  
Director of Public Finance

**State of Illinois Credit Default Swap Questions**  
**(January 1, 2015 through March 31, 2015)**

Disclose whether your firm has participated in credit default swap market-making activities related to any State of Illinois credit default swaps (“CDS”) within the past 3 months. Please include and/or indicate the following:

- In the event of your firm’s participation in State of Illinois CDS activities within the past 3 months, please disclose your firm’s cumulative notional volume of State of Illinois CDS trades and the firm’s outstanding gross and net notional amount of State of Illinois CDS, as of the end of the current 3-month period.

Not Applicable. The Williams Capital Group, L.P. (“Williams Capital”) has not participated in any State of Illinois CDS activities during the period commencing January 1, 2015 and ending March 31, 2015.

- Disclose whether your firm has entered into any proprietary trades for its own account in State of Illinois CDS, as of the end of the current 3-month period.

Williams Capital has not entered into any proprietary trades for its own account in State of Illinois CDS during the most recent 3-month period, ending March 31, 2015.

- Disclose your firm’s outstanding gross and net notional amount of proprietary State of Illinois CDS and whether the net position is short or long credit protection, as of the end of the current 3-month period.

Williams Capital does not have any positions in CDS.

- List all time periods during the past 3 months during which the firm held net long or net short State of Illinois CDS proprietary credit protection positions, the amount of such positions, and whether those positions were net long or net short credit protection positions.

Williams Capital has not held and does not have any positions in CDS.

- Indicate whether within the previous 3 months, the firm released any publicly available research or marketing reports that reference State of Illinois CDS and include those research or marketing reports as attachments.

Williams Capital has not published nor released any publicly available research or marketing report that references State of Illinois CDS.